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5 UNITED STATES DISTRICT COURT
6 NORTHERN DISTRICT OF CALIFORNIA
7 SAN FRANCISCO DIVISION

8 LSI Corporation, Agere Systems LLC,
9 and Avago Technologies General (IP)
Singapore) Pte. Ltd.

10 Plaintiffs,

11 v.

12 Funai Electric Co., Ltd.; Funai
13 Corporation, Inc.; P&F USA, Inc.; and
Funai Service Corporation,

14 Defendants.

CASE NO. 15-CV-04307-EMC

**~~[PROPOSED]~~ STIPULATION &
ORDER RE: FURTHER
CONTINUATION OF DEADLINE
FOR DEFENDANTS' PATENT L.R.
3-4 DISCLOSURES**

15 WHEREAS, Plaintiffs LSI Corporation, Agere Systems LLC, and Avago
16 Technologies General (IP) Singapore Pte. Ltd. (collectively "Avago") and
17 Defendants Funai Electric Co., Ltd.; Funai Corporation, Inc.; P&F USA, Inc.; and
18 Funai Service Corporation (collectively "Funai") have stipulated to an additional
19 one-week continuation of the current December 21, 2015 deadline for Funai's
20 disclosures under Patent L.R. 3-4—Funai's document production accompanying
21 invalidity contentions. The current December 21, 2015 deadline was set by this
22 Court's order, Dkt. No. 104. Funai and Avago are currently attempting to negotiate
23 a potential stipulation that may set forth a set of representative products for the
24 larger list of accused products identified in Avago's Patent L.R. 3-1 infringement
25 contentions. The parties have exchanged drafts of the stipulation, but are still
26 working toward finalizing the specific terms of the stipulation.

27 Again, this proposed stipulation, if agreed to by the parties and approved by
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the Court, may improve judicial efficiency and reduce the burden on the Court, the jury, Avago and Funai, and may narrow the number of products that will require an infringement analysis. The parties have previously stipulated to modify this deadline by one-week, which was entered by this Court in Dkt. No. 104. Further modification of this deadline by one week will not affect any other deadlines in this action. Therefore, for the good cause shown above, it is hereby ORDERED that Funai shall serve its Patent L.R. 3-4 disclosures on December 28, 2015.

IT IS SO STIPULATED, through Counsel of Record.

Dated: December 18, 2015

/s/ Kevin W. Kirsch

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Dated: December 18, 2015

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Attorney for Plaintiffs LSI Corporation, Agere Systems LLC, and Avago Technologies General IP (Singapore) Pte. Ltd.

PURSUANT TO STIPULATION, IT IS SO ORDERED that the forgoing Agreement is approved.

Dated: December 21, 2015

UNITED STATES DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
SEPARATE JUDGE



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